

1 HONORABLE THOMAS S. ZILLY
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 HUNTERS CAPITAL, LLC, et al.,

11 Plaintiffs,

12 v.

13 CITY OF SEATTLE,

Defendant.

14 No. 20-cv-00983

15 **DECLARATION OF DAN WHIPPLE**

16 I, Dan Whipple, declare as follows:

17 1. I am over the age of eighteen, competent to testify, and have personal knowledge
18 of the facts set forth herein.

19 2. I am employed by the City of Seattle in the Information Technology Department
20 as a CAD Administrator. I was previously employed directly by the Seattle Fire Department
21 (“SFD”), and have experience working with SFD’s CAD System.

22 3. SFD operates its own CAD system. This system can generate notifications that
23 can be sent out via text message. These messages are sent to collections of individuals called
24 paging groups.

25 4. SFD Chief Harold Scoggins is a member of numerous CAD paging groups,
26 including: Staff (Deputy and up); FF injury w/ Transport; OPS All (All SFD Units); SFD All
Medic Standby; Accident (SFD Apparatus); FAC Emergency; Arson/Bomb threat; USAR Alert

DECLARATION OF DAN WHIPPLE- 1
(Case No. 20-cv-00983)

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1 Activation; OUTMD; SAFT1 Group; SPOC; and Tunnel Responses.

2 5. For this reason, he receives a significant number of notifications on a daily basis.

3 6. At the request of counsel for the City, I collected historical records of the CAD
4 messages sent to Chief Scoggins via text. I was able to find 13,618 records from between
5 December 24, 2014 and December 31, 2020. The spreadsheet with these messages included the
6 message text, an ID number for the message, and information regarding the date and time it was
7 sent.

8 I declare under penalty of perjury under the laws of the State of Washington that the
9 foregoing is true and correct.

10 SIGNED at Seattle, Washington, this 25 day of October 2022.

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14 Dan Whipple
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